



**Department of Energy**  
**Ohio Field Office**  
**Fernald Environmental Management Project**  
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**4603**

NOV 20 2002

Mr. James A. Saric, Remedial Project Manager  
United States Environmental Protection Agency  
Region V-SRF-5J  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

DOE-0098-03

Mr. Tom Schneider, Project Manager  
Ohio Environmental Protection Agency  
401 East 5<sup>th</sup> Street  
Dayton, Ohio 45402-2911

Dear Mr. Saric and Mr. Schneider:

**TRANSMITTAL OF RESPONSES TO OHIO ENVIRONMENTAL PROTECTION AGENCY  
COMMENTS AND THE FINAL CERTIFICATION REPORT FOR THE AREA 5 EASTERN FIELD**

- References:
1. Letter, J. Saric to J. Reising, "A5 Eastern Field Certification Report," dated October 9, 2002
  2. Letter, T. Schneider to J. Reising, "Certification Report for the Area 5 Eastern Field," dated October 22, 2002

Enclosed for your approval are responses to the Ohio Environmental Protection Agency (OEPA) comments and the final Certification Report for the Area 5 Eastern Field. This report has been revised to incorporate the OEPA comments, and now includes an appendix providing real-time scanning and physical sampling data collected from this area since the draft Certification Report was issued.

If you have any questions or need further information, please contact Robert Janke at (513) 648-3124.

Sincerely,

Johnny W. Reising  
Fernald Remedial Action  
Project Manager

FEMP:R.J. Janke

Enclosures: As Stated

NOV 20 2002

DOE-0098-03

Mr. James A. Saric  
Mr. Tom Schneider

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## cc w/enclosure:

R. Janke, OH/FEMP  
A. Murphy, OH/FEMP  
T. Schneider, OEPA-Dayton (three copies of enclosure)  
G. Jablonowski, USEPA-V, SRF-5J  
F. Bell, ATSDR  
M. Cullerton, Tetra Tech  
M. Shupe, HSI GeoTrans  
R. Vandegrift, ODH  
AR Coordinator, Fluor Fernald, Inc./MS78

## cc w/o enclosure:

R. Greenberg, EM-31/CLOV  
N. Hallein, EM-31/CLOV  
J. Reising, OH/FEMP  
A. Tanner, OH/FEMP  
D. Carr, Fluor Fernald, Inc./MS2  
J. Chiou, Fluor Fernald, Inc./MS64  
T. Hagen, Fluor Fernald, Inc./MS9  
E. Kroger, Fluor Fernald, Inc./MS64  
F. Miller, Fluor Fernald, Inc./MS64  
T. Poff, Fluor Fernald, Inc./MS65-2  
ECDC, Fluor Fernald, Inc./MS52-7

**RESPONSES TO OHIO ENVIRONMENTAL PROTECTION AGENCY COMMENTS  
ON THE DRAFT CERTIFICATION REPORT FOR THE AREA 5 EASTERN FIELD  
(20820-RP-0001, REVISION A)**

**FERNALD ENVIRONMENTAL MANAGEMENT PROJECT**

**GENERAL COMMENT**

Commenting Organization: Ohio EPA

Commentator: OFFO

Section #: General Comment Pg. #:

Line #:

Code: C

Original Comment #: 1

Comment: For documentation purposes and to eliminate future confusion, this report should explain the changes from the standard SEP procedures for certification used in generating this report. Please make the appropriate corrections.

Response: Agree. The deviations from standard certification procedures will be discussed the Certification Report. Note that these deviations are limited to sequence of document submittals, as all Sitewide Excavation Plan (SEP)-identified certification data collection and analysis protocol were followed.

Action: Add the following text to discussion Section 2.1, Certification Strategy:

"In order to accommodate the accelerated schedule for construction of the OSDF Sediment Basin #2, several deviations were made to the certification procedures identified in the SEP. These changes were limited to schedule and sequence of document submittal, as all certification sampling and analytical criteria were followed in accordance with the SEP.

Until recently, this portion of the site was largely uncharacterized, and the need for remedial excavations was unknown. However, based on historical information and aerial photographs, it was likely that soil constituent of concern (COC) concentrations were below the FRLs. Therefore, the Project Specific Plan (PSP) for Area 5 Predesign Investigation (DOE 2002a) detailed a sampling approach sufficient to meet the SEP-identified certification criteria. When the results of this investigation were demonstrated to be sufficient for certification, the Certification Report was issued. Based on this, the following changes to the standard certification process were made:

- The Certification Design Letter for the A5EF was submitted as an attachment to the Certification Report. However, information related to ASCOCs and CU boundaries was considered for development of the predesign investigation PSP
- A PSP for the A5EF Certification Sampling was not issued; instead, these certification data were collected in the predesign phase with sampling density and protocol consistent with that identified in the SEP
- Though the A5EF was demonstrated to be non-impacted, the more conservative Group 1 CUs were established in this area instead of the larger, Group 2 CUs
- A CU number was not included in the certification sample identification numbers, and the sample numbers were sequential (one through 36), instead of being repeated for each CU.

These deviations to the Certification Strategy identified in the SEP do not compromise rigor of the certification effort, or the quality of the certification data."

### SPECIFIC COMMENTS

Commenting Organization: Ohio EPA  
Section #: 3.2 Pg. #: 3-2 Line #: 8-14 Commentator: OFFO  
Original Comment #: 2 Code: C

Comment: Considering the ditches received runoff from the production area, it seems appropriate that some level of sampling for Tc-99 should be conducted to ensure it's not an issue.

Response: Agree.

Action: Four samples will be collected from soil at the base of the northern A5EF drainage ditch and analyzed for technetium-99. These results will be provided in Appendix D to the Certification Report for the A5EF. The reference to Appendix D will be added to Section 3.2 of the Certification Report.

Commenting Organization: Ohio EPA  
Section #: 1.2 Pg. #: 1-1 Line #: 27-29 Commentator: OFFO  
Original Comment #: 3 Code: C

Comment: Please reference the real-time scan data figures with the appropriate text, which is mentioned in this paragraph.

Response: Agree.

Action: A reference to the real-time data maps in Appendix A (Figures A-1 through A-4) will be added to Section 1.2 of the Certification Report.